

# STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

November 27, 2007

Ms. Shirley J. Olinger, Manager Office of River Protection United States Department of Energy P.O. Box 450, MSIN: H6-60 Richland, Washington 99352

Mr. William S. Elkins, Project Director Bechtel National, Inc. 2435 Stevens Center Place, MSIN: H4-02 Richland, Washington 99354



**EDMC** 

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form 

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class <sup>1</sup>1 Modification submitted October 18, 2007. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

Modification 24590-HLW-PCN-ENV-06-013 provides the updated Piping and Instrument Diagrams for the High-Level Waste Facility Canister Decontamination Handling System.

- 24590-HLW-M6-HDH-P0001, Revision 2.
- 24590-HLW-M6-HDH-P0002, Revision 2.
- 24590-HLW-M6-HDH-P20001, Revision 2.

The parties agree that during the transition period from permit drawings to engineering source drawings, items not requiring an installation inspection or inclusion in the Independent Qualified Registered Professional Engineer report may be shown in phantom. Ecology is approving the design changes identified in the Permittees' submittal. However, decisions regarding the regulation of items shown in phantom will be made at a later date.

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At the end of the transition period, permit submittals will contain engineering source documents and will be incorporated into the permit as described in Ecology Publication # 07-05-006 (www.ecy.wa.gov/biblio/nwp.html).

If there are any questions, contact me at 509-372-7882 or David Becker at 509-372-7990.

Sincerely,

Brenda Becker-Khaleel WTP Permit Writer

**Nuclear Waste Program** 

trw/jc Enclosure

cc electronic w/enc:

Dave Bartus, EPA

Brinda L But Hulel

John Eschenberg, USDOE

Lori Huffman, USDOE

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Sandi Murdock, BNI

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Phil Peistrup, WGI

cc w/enc:

4-0-8

Administrative Record: Tank Waste Treatment Requirements <

**Environmental Portal** 

Hanford Operating Record General File

**USDOE-ORP Correspondence Control** 

# Hanford Facility RCRA Permit Modification Notification Form Part III, Operating Unit 10

# **Waste Treatment and Immobilization Plant**

Index

Page 2 of 3:

Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant Update HLW Vitrification Building Piping and Instrumentation Diagrams (P&IDs) for the HLW Canister Decontamination Handling System (HDH-VSL-00001, HDH-VSL-00002, HDH-VSL-00003 and HDH-VSL-00004) in Appendix 10.2 of the Dangerous Waste Permit.

Submitted by Co-Operator:

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Reviewed by ORP Program Office:

Date

Hanford Facility RCRA Permit Modification Notification Form				
Unit:	-	Permit Part & Chapter:		
Waste Treatment and Immobilization Plant		Part III, Operating Unit 10		

## Description of Modification:

The purpose of this Class 1 prime modification is to update the Piping and Instrumentation Diagrams (P&IDs) for the HLW Canister Decontamination Handling System (HDH-VSL-00001, HDH-VSL-00002, HDH-VSL-00003 and HDH-VSL-00004). The following permit P&IDs are submitted to replace those currently in Appendix 10.2.

Appendix	10.2			
Replace:	24590-HLW-M6-HDH-P0001, Rev. 1	With:	24590-HLW-M6-HDH-P0001, Rev. 2	
	24590-HLW-M6-HDH-P0002, Rev. 1	1	24590-HLW-M6-HDH-P0002, Rev. 2	
	24590-HLW-M6-HDH-P20001, Rev. 1		24590-HLW-M6-HDH-P20001, Rev. 2	

The referenced P&IDs are complete revisions. They incorporate changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.) and changes associated with the resolution to comments on change documents since the issuance of the last revision of the permitted drawing. This modification requests Ecology approval and incorporation into the permit, the specific changes to these P&IDs that are indicated by a note on each P&ID, clouds, and/or revision triangles. Revisions are the result of ongoing design changes. The following identifies the significant types of changes on the attached drawings.

### 24590-HLW-M6-HDH-P0001

Specific changes to this P&ID are provided on note 33.

- Revised slope notation to specific lines
- Added, revised, and deleted notes, holds, and references
- Revised various off-sheet connectors and/or descriptions
- Revised through wall penetration designations from wall boxes to p-joggles
- Combined overflow line vents (HDH-VSL-00002 and HDH-VSL-00004) and routed to PJV Header through demister (HDH-DMST-00001)
- Revised various quality/seismic identifiers
- Revised and added line identification numbers.

#### 24590-HLW-M6-HDH-P0002

Specific changes to this P&ID are provided on note 32.

- · Revised slope notation to specific lines
- Added, revised, and deleted notes, holds, and references
- Revised various off-sheet connectors
- Revised through wall penetration designations from wall boxes to p-joggles
- Added level element LE 0125 (coordinates B6)
- Added check valves HDH-V-00107 and HDH-V-00251 (coordinates F4)
- Revised various quality/seismic identifiers
- Revised and added line identification numbers.

## 24590-HLW-M6-HDH-P20001

Specific changes to this P&ID are provided on note 31.

- Incorporated updates to design
- Revised slope notation to specific lines
- Added, revised, and deleted notes, holds, and references
- Revised various off-sheet connectors
- Revised through wall penetration designations from wall boxes to p-joggles
- Combined overflow line vents (HDH-VSL-00002 and HDH-VSL-00004) and routed to PJV Header through demister (HDH-DMST-00001)
- Added demister HDH-DMST-00001 (coordinates G3)
- Revised and added various quality/seismic identifiers
- Revised and added line identification numbers.

The following is a list of outstanding change document None	s that have not	been incorpora	ated into this m	iodification:				
200 M. W. Chan 12	Close 1	Class <sup>1</sup> 1	Class 2	Class 3				
WAC 173-303-830 Modification Class: 12	Class 1		Class 2	Class 3				
Please mark the Modification Class:		X						
Enter Relevant WAC 173-303-830, Appendix I Modification citation number: N/A  Enter wording of WAC 173-303-830, Appendix I Modification citation:  In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class <sup>1</sup> 1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."								
Modification Approved: Yes No (state rea	ason for denial)	Sibuh-fi	viewed by Eco	llogy:  11/27/07				

<sup>&</sup>lt;sup>1</sup> Class 1 modifications requiring prior Agency approval.

<sup>&</sup>lt;sup>2</sup> If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.